

From: Shah, Haiyesh
To: [Austin, Mark](#)
Cc: [Carpenter, Angela](#); [Vaughn, Stephanie](#)
Subject: Am. Cyanamid Site (Wyeth/Pfizer)-Bridgewater-NJ-RTC-April2018 FFS- OU8
Date: Friday, May 18, 2018 11:49:37 AM
Attachments: [ATT00001.txt](#)

Mark,

Gwen and I have reviewed the subject RTC. The RTC addresses all of NJDEP comments. We have no further comments/concerns on the OU8 FFS.

Thank you for resolving our comments/concerns.

Haiyesh.

From: Zervas, Gwen
Sent: 18 May, 2018 9:31 AM
To: Shah, Haiyesh <Haiyesh.Shah@dep.nj.gov>
Subject: RE: EPA response to NJDEP final comments on the April 2018 FFS for OU8 at American Cyanamid

I agree, the responses are good/address DEP's concerns.

From: Shah, Haiyesh
Sent: Thursday, May 17, 2018 4:03 PM
To: Zervas, Gwen <Gwen.Zervas@dep.nj.gov>
Subject: EPA response to NJDEP final comments on the April 2018 FFS for OU8 at American Cyanamid

I have reviewed the following RTC from USEPA. I am satisfied with it. I would appreciate your input before I get back to USEPA. Tx.

From: Austin, Mark [<mailto:Austin.Mark@epa.gov>]
Sent: 17 May, 2018 3:53 PM
To: Shah, Haiyesh <Haiyesh.Shah@dep.nj.gov>
Cc: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Carpenter, Angela <Carpenter.Angela@epa.gov>
Subject: EPA response to NJDEP final comments on the April 2018 FFS for OU8 at American Cyanamid

Mr. Shah,

We (EPA) have received your (NJDEP's) comments on the April 2018 Focused Feasibility Study Report for Operable Unit 8 at the American Cyanamid Superfund site. In the interest of expediting a response to your comments, please accept this electronic submission as EPA's formal response.

The following numbers identifies the comment with EPA's response:

1. As NJDEP commented previously, use of Impoundment 8 Facility as Corrective Action Management Unit (CAMU) would require establishment of performance standards/criteria (treatment levels, leachability determination, strength, liner compatibility, etc.)

EPA response: We note your concern. While substantial work has been completed to establish performance standards for use of the CAMU, further determinations will need to be made if the CAMU is utilized as part of the OU8 remedy. We continue to believe that the CAMU can be used for the final deposition of the waste materials after treatment however at this time, standards and treatment levels have not been formally approved. Further, if the CAMU is part of the remedy, the Record of Decision will identify our agreed upon approach to determining final performance standards/criteria.

2. Stemming from a previous NJDEP note (# 8) - NJDEP air pollution control standards are based on the 10-6 target cancer risk level and non-cancer hazard index of 1.0 however, no further changes to the Report were proposed.

EPA response: We acknowledge your comment. These standards will be identified in the Record of Decision.

3. A further note from NJDEP's previous comment #19: You've mentioned that 1988 New Jersey Pollution Discharge Elimination System-Discharge to Groundwater (NJPDES-DGW) which is issued by NJDEP for the Impound 8 Facility (incorporating requirements of RCRA Subtitle C) included requirements for maximum allowable leachate level through detection and monitoring. These requirements would be applicable or relevant and appropriate requirements (ARARs) if Impoundment 8 Facility is used as CAMU for consolidation of treated/stabilized waste/material.

EPA response: We acknowledge your comment and agree that if the CAMU will be utilized as part of the remedy, these requirements will be included as an ARAR within the Record of Decision.

If you have any further concerns, please contact me.

Thank you for your help on this.

Regards,
Mark

Mark Austin, Remedial Project Manager
US EPA Region II